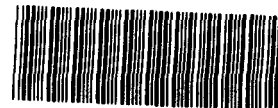


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EG&G ROCKY FLATS

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DIST	LTR	EN
AMARAL M E		
BURLINGAME A H		
BUSBY W S		
BRANCH D B		
CARNIVAL G J		
DAVIS J G		
FERRERA D W		
FRAY R E		
GEIS J A		
GLOVER W S		
GOLAN P M		
HANNI B J		
HARMAN L K		
HEALY T J		
HEDAH L I		
HILBIG J G		
HUTCHINS N M		
JACKSON D T		
KELL R E		
KUESTER A W		
MARX G E		
MCDONALD M M		
McKENNA F G		
MONTROSE J K		
MORGAN R V		
POTTER G L		
PIZZUTO V M		
RISING T L		
SANDLIN N B		
SCHWARTZ J K		
SETLOCK G H		
STEWART D L		
STIGER S G	/	
TOBIN P M		
VOORHEIS G M		
WILSON J M		
E. C. MASTERMAN	/	
L. J. P. W.	/	
CORRES CONTROL	X	X
ADMIN RECORD/080	/	/
TRAFFIC		
PATS/T130G		

EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402 0464 • (303) 966 7000

November 21, 1994

94-RF-11600

Jessie M Roberson
Assistant Manager for
Environmental Restoration
DOE, BFO

OPERABLE UNIT (OU) NUMBER 7, TRANSMITTAL OF RESPONSE SUMMARY - SGS-606-94

Action Please transmit copies of the response summary to the regulatory agencies and review/provide comments on response summary to the Department of Energy (DOE) comments by November 28

This letter transmits seven copies of the response summary to the Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency (EPA) comments on the Proposed Action Memorandum for the Seep Collection and Treatment System. No public comments were received. Please transmit two complete copies of the response summary to each of the regulatory agencies before Monday, November 28, 1994.

Three copies are also attached of the response summary to DOE comments. Please review for adequacy and provide comments by November 28, 1994.

If you have any questions regarding this transmittal, please contact me, or Laurie J Peterson-Wright at extension 8553

Ed Strayer

S G Stiger
Director
Environmental Restoration Program Division

LJPW cb

Orig and 1 cc - J M Roberson

**Attachments
As Stated**

cc
M N Silverman - DOE, RFFO



CLASSIFICATION

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UNCLASSIFIED	<input checked="" type="checkbox"/>	
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER
DOCUMENT CLASSIFICATION
CLASSIFICATION PER
CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO

ACTION ITEM STATUS
☐ PARTIAL/OPEN
☒ CLOSED

LTR APPROVALS
ORIG & TYPIST INITIALS
LTP-W / CB

ADMIN RECORD

**DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE**

A-01107-0000

**Responses to Comments from DOE
Draft Seep Collection and Treatment
Proposed Action Memorandum
Operable Unit No. 7**

DOE COMMENTS

1. Kurt Muenchow

1.1 Comment

Good job being able to incorporate last-minute changes in design for the seep collection, and in being responsive regarding requests for information for the Public Meeting and discussing the RCRA waste code issues All that and on time too!

Response

Thank you

1.2 Comment

P 4 of 26, para 3 Please indicate the date(s) of hazardous waste disposal at the landfill

Response

The exact dates of hazardous waste disposal are not known Waste streams were characterized in 1986, and in the fall of that year, wastes with hazardous constituents were no longer buried in the landfill (EG&G, 1994) The sentence "Disposal of hazardous wastes in the landfill was discontinued in 1986 " was added

1.3 Comment

Figure 3-2 Will direct precipitation/snow-melt contribute significantly to collection flows/volume with @ 40 sq ft of drain rock exposed? Are we using the cheapest material for synthetic liner? PVC may be cheaper than HDPE - it only has to last a couple of years

Response

Based on a total 1992 rainfall at RFETS of 15 inches, the estimated added volume from rainfall is approximately 400 gal/year or about 1.5 percent of the tank capacity of 26,000 gallons

Twenty mil HDPE and PVC are both \$0 12/LF In addition, PVC may be harder to get in today's market because it is not used often

1 4 Comment

P 15 of 26, sect 3 5 Please write a paragraph which emphasizes the compatibility of the chosen approach with the presumptive remedy as a reason for selection of the proposed technology

Response

The following paragraph was inserted "The collection sump was also the most compatible with the presumptive remedy of capping the landfill The components of this alternative are low cost or can be removed easily prior to the capping for reuse during the IM/IRA "

1.5 Comment

P 16 of 26, final para How did we decide that for chemicals without ARARs or TBCs that we select 10X CLP detection limits? Please provide justification for this position, or if it is arbitrary, perhaps we can look to performance standards established for these chemicals elsewhere on site, (PRGs?? OU 1, or OU 2 treatment standards?) Also, in this section, can we write a paragraph that describes OU-1 and /or OU-2 waste acceptance criteria and how it relates to the seep water characterization?

Response

The following constituents (constituents) have no proposed performance standard in the OU 7 Draft Proposed PAM

2-Hexanone

Vinyl Acetate

Lithium

Strontium

Tin

2-Methylnaphthalene¹

4-Methylphenol¹

Dibenzofuran¹

¹ *These constituents are not listed in either 40 CFR 302.4 or 6 CCR 1007-3 Pt 261-Appendix VIII and therefore are not required to be addressed under a CERCLA remedial action*

There were no OU 1 or OU 2 treatment standards available for these constituents, except for lithium The OU 1 treatment facility has a performance standard of 2,500 µg/L for lithium, and this value should be the proposed performance standard for the OU 7 PAM For the remaining constituents, there were no MCL, PQL, FO 39, site-

specific, or statewide stream standards available. Of these constituents, only vinyl acetate, strontium, and tin have Programmatic Risk-Based Preliminary Remediation Goals (PRG) in the July 1994 Programmatic PRG document. The PRG values were not selected as a proposed performance standard because no risk-based comparisons were required per the OU 7 work plan. Therefore, if a risk-based PRG was selected instead of an ARAR, then a risk-based assessment may need to be performed for many or all of the other contaminants. Consequently, the PRG values were not selected.

The selection of 10X the CLP detection limits was not arbitrary. When no ARAR or TBC value exists for a chemical, the next source of a potential conservative clean-up value is the chemicals practical quantification limit (PQL). A PQL may be defined as 10 times the EPA published detection limit when not otherwise published. Therefore, where a no ARAR or TBC was available for a constituent, a value of 10X the CLP detection limit was suggested.

Several of the metals, VOCs, and semi-VOCs that are found in the OU 7 seep water do not have a designated performance standard at the OU 1 or OU 2 treatment facilities. Performance standards were designated for the OU 1 and OU 2 water treatment facilities based on compounds detected during Remedial Investigation activities for each Operable Unit. The absence of performance standards for specific chemicals or compounds found in the OU 7 seep water does not indicate that the treatment facilities cannot treat those compounds. The lack of performance standards simply shows that those compounds were not identified as chemicals of concern for that particular facility. The OU 1 and OU 2 water treatment equipment will be capable of removing the identified compounds found in the OU 7 water. The suggested performance standards of ten times the EPA Contract Laboratory Program (CLP) for compounds where no ARARs or TBCs exist is recommended to facilitate successful treatment.

Treatment plant acceptance criteria are not ARARs and should not be discussed in the Potential ARARs section. A brief discussion of waste acceptance criteria is included in the description of the proposed action.

Stoller performed a detailed analysis of the compatibility of the seep water with the treatment processes based on the acceptance criteria. This analysis included discussions with the OU 1 and OU 2 operators to resolve potential problem areas. Before completing the analysis, Stoller was given direction that the combined OU 1/OU 2 treatment facility would likely be used and because acceptance criteria do not exist, no additional analysis should be performed. Since then, Stoller has been directed by CDPHE/EPA to remove ARARs from the document and state that constituents will be treated to the effluent standards of the appropriate treatment facility.

1.6 Comment

P 22 of 26, section 4.2 Instead of simply asserting that VOC release impacts will be minimal in comparison to normal RFETS OPS (with the implication that normal OPS are releasing vast quantities of VOCs, change this section to describe the net positive

impact on air quality (or at least no change) of collecting the seep for treatment Call me if you have questions on this point, as we definitely need to change this text

Response

Delete the sentence "Both these impacts will be minimal in comparison to normal operational activity at RFETS" Insert the sentence "The collection, storage, and treatment facilities are closed systems and will therefore have a minimum impact on air quality"

1.7 Comment

P 23 of 26, section 4.6 This section must either be eliminated or re-written to describe actions we will take during construction to mitigate potential exposure to construction workers (personnel) Do away with all existing text

Response

Revise the paragraph to read "The proposed action removes the seep water that may be a source of contamination for both surface water and groundwater thus eliminating potential pathways for further migration Potential exposures by RFETS workers during construction and operation will be mitigated by following the Site-Specific Health and Safety Plan"

1.8 Comment

P 23 of 26, section 4.7 Rewrite this section to quantify estimated costs for this action Also estimate person-hour commitments Include some language in this section to describe "cost/schedule" savings realized as a result of this simplified approach

Response

No other options are presented, therefore, cost/schedule savings cannot be quantified In addition, based on discussions with the regulatory agencies, costs are not to be included in the PAM

1.9 Comment

P 25 of 26, section 5 I don't understand the first sentence regarding the PAM schedule "superseding" the Table 6 IAG milestones Maybe we mean "complement" IAG schedules? Please either re-write to explain the proposed schedule, or give some additional explanation of what this statement means

Response

"Supersedes" was replaced with "complements"

**Responses to Comments from DOE
Draft Seep Collection and Treatment
Proposed Action Memorandum
Operable Unit No. 7**

DOE COMMENTS (cont.)

2 Scott R. Surouchak/AMPME

2.1 Comment

Signature Page Why do we have this page?

Response

This page is required for EG&G Document Control but should not have been submitted with the PAM

2.2 Comment

P 1 of 1, para one. [the referenced text states "the seep collection and treatment PAM presents the U S Department of Energy's proposed action to] Then why are we not approving?

Response

See response to Comment 2 1

2.3 Comment

P 1 of 1, para two [The referenced text states " Compliance with potential applicable or relevant and appropriate requirements "] For what? SW, GW,?

Response

The text was revised to read " compliance with potential applicable or relevant and appropriate requirements for seep water that may be a source of contamination for groundwater and surface water "

2.4 Comment

P 1 of 1, para three Delete "leachate" Replace with "seep water"

Response

Revision made

2 5 Comment

P 1 of 26, para one. Insert "beneath"

Response

Water is seeping from artificial fill placed as part of the present landfill not from beneath the landfill

2.6 Comment

P 1 of 26, para two Insert "of seep water"

Response

The sentence has been revised to read " to eliminate discharge of seep water to a surface water body "

2.7 Comment

P 1 of 26, para two ARARs for what??

Response

The sentence has been revised to read " (ARARs) for seep water that may be a source of contamination of groundwater and surface water "

2 8 Comment

P 4 of 26, para five It looks more like a GW diversion This is called a GW intercept system on 2-11 The text was revised to state "The existing system which was built as part of the subsurface drainage control system "

Response

The subsurface drainage control system consists of both a leachate collection system and a groundwater intercept system [Workplan, DOE, 1994] Figure 2-1 was revised to show a "subsurface drainage control system "

2.9 Comment

P 6 of 26, para one Summary discussion of concentrations at least!!

Response

A table showing constituents, average concentrations, and maximum concentrations will be shown in Section 2 3

2 10 Comment

P 7 of 26, bullet list [• Source area groundwater control to contain plume • Leachate collection and treatment] What's the difference??

Response

This text is from the Presumptive Remedy Guidance In a typical landfill, the waste is above the groundwater table Leachate is water that percolates through the landfill At OU 7, the groundwater table runs through the waste thus blurring the distinction between leachate and groundwater In the IM/IRA, we propose combining the two bullets, however, this distinction does not affect the PAM

2.11 Comment

P 8 of 26, para three Why 6-inch??

Response

Four-inch pipe is used to be conservative for a minimal increase in cost

2.12 Comment

P 8 of 26, Why are all the averages differing? Better explanation or clarification required!!

Response

The average flow of 4 gpm was just rounding of the 3 6 gpm The text will be revised to use the 3 6 gpm

2.13 Comment

P 8 of 26, last sentence, Change "alarm" to "switch" Is the system alarmed?

Response

Revision made The system is alarmed with a beacon light on top of the control panel

2 14 Comment

P 11 of 26, first bullet Greg L. said pond already drained down

Response

Approximately one-third of the water in the pond has been drained The pond will be drained as required prior to start of construction

**Responses to Comments from DOE
Draft Seep Collection and Treatment
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Operable Unit No. 7**

DOE COMMENTS (cont.)

3 Unknown Author

3.1 Comment

Signature Page Do these go with final PAM? Why? Where is DOE signature?

Response

This page is required for EG&G Document Control but should not have been submitted with the PAM

3.2 Comment

P 1 of 1, Executive Summary, para one Insert "removal" What level, why?

Response

Sentence revised to read " proposed removal action " The objective or "Why" is stated in the last sentence of this paragraph

3.3 Comment

P 1 of 26, para one Insert "removal" Delete "remedial" Replace with removal

Response

Revisions made in text

3.4 Comment

Figure 1-1 Plant, site or RFETS Be consistent See figures 3-2, 3-3, 3-4

Response

Rocky Flats Environmental Technology Site or RFETS will be used Figures revised

3.5 Comment

P 4 of 26, para four I don't think it got Part B approval, nor do I think it actually has interim status Check facts with Kyle Peter

Response

The text will be revised to delete this reference

3.6 Comment

Figure 2-1 See Comment 4

Response

Figure revised

3.7 Comment

Figure 3-1 See Comment 4

Response

Figure revised

3.8 Comment

P 11 of 26, second sentence Treatment?

Response

The sentence was revised to read " prior to actual treatment "

3.9 Comment

P 15 of 26, para three Insert "and effective"

Response

Revision made

3.10 Comment

P 22 of 26, para three Landfill or A/B series [pond]

Response

The text refers to the East Landfill Pond as referenced in the previous sentence The text will be revised to clarify this

3.11 Comment

P 23 of 26, section 4 6 Change title to "Exposure Pathways"

Response

Revision made

3.12 Comment

P 23 of 26, para five ? "interest"

Response

Text modified to read "Substances of interest include "

3.13 Comment

P 23 of 26, section 4 7. How much? \$10K, \$500K, \$1 5M order of magnitude

Response

Based on discussions with the regulatory agencies, costs are not to be included in the PAM

3.14 Comment

P 24 of 26, para two. Change "minimal" to "limited"

Response

Revision made

3 15 Comment

P 24 of 26, para two Oh- this is a removal action Why not state that upfront!

Response

References to the proposed action as a removal action were included in the Executive Summary and Section 1 (Purpose)

3.16 Comment

P 24 of 26, para two Insert "potential"

Response text revised to read " to address potential threats "